

Kearney/Centaur Division  
A.T. Kearney, Inc.  
225 Reinekers Lane  
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Alexandria, Virginia 22313  
703 548 4700  
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Management  
Consultants

ENFORCEMENT SENSITIVE

**ATKEARNEY**

October 12, 1990

Ms. Carol Johnson  
Regional Project Officer  
U.S. Environmental Protection Agency  
Region III (3HW-34)  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

Reference: EPA Contract No. 68-W9-0040; Work Assignment No. R03-20-01; GMC Delco Moraine; Fredericksburg, Virginia; EPA I.D. No. VAD0091222588; Compliance Enforcement Inspection (CEI) and Land Disposal Restriction (LDR) Inspection; Deliverable

Dear Ms. Johnson:

Please find enclosed the letter report for the land disposal restrictions (LDR) inspection and the compliance evaluation inspection (CEI) conducted at the referenced facility. This letter report is submitted as partial fulfillment of the reporting requirements for this work assignment. Please note that this document is Enforcement Sensitive.

In summary, one potential violation and three areas of concern of 40 CFR 262 and 264 were noted during a review of the facility's records and the inspection of the facility. The violation of 40 CFR 265.17(a) involved the enforcement of a no smoking policy in the area of D001 waste generation. The facility maintains that its waste is not ignitable because it is a solid. However, there is no documentation of testing to prove this statement.

The areas of concern include waste management practices which could not be viewed at the time of the inspection. The inspection team did not observe any drums ready for transport, and therefore, could not determine whether the drums were being labelled according to DOT regulations. Secondly, facility personnel indicated that the salt baths are desludged weekly and stored in a satellite accumulation for solidification before transported to the outdoor drum storage area. The inspection team could not determine whether more than one drum was being stored in this satellite accumulation area, which would be a violation of 40 CFR 262.32. In addition, there is concern whether the facility's D001 waste could be reactive.

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If you have any questions concerning this letter report, please  
contact me or (b) (6) (703) 548-4700.

Sincerely,

(b) (6)

(b) (6)

Technical Director

Enclosure

cc: J. Barnett, EPA Region III

(b)  
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(6)

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October 12, 1990

**ATKEARNEY**

Mr. Dana J. Barnett  
Work Assignment Manager  
U.S. Environmental Protection Agency  
EPA Region III  
Philadelphia, Pennsylvania 19107

Reference: EPA Contract No. 68-W9-0040; Work  
Assignment No. R03-20-01; GMC Delco  
Moraine; Fredericksburg, Virginia; EPA I.D.  
No. VAD0091222588; Compliance Enforcement  
Inspection (CEI) and Land Disposal  
Restriction (LDR) Inspection

Dear Mr. Barnett:

A.T. Kearney, Inc. received Work Assignment R03-20-10 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0040 to conduct RCRA inspection activities at various facilities in EPA Region III. The purpose of this letter is to present the findings of conducted on August 15, 1990 by the Kearney Team regarding the GMC Delco Moraine facility in Fredericksburg, Virginia.

The objective of the inspection was to evaluate the facility's compliance with 40 CFR 260-266 and 268 which stipulate required hazardous waste management practices for hazardous waste generators, transporters, and treatment, storage and disposal (TSD) facilities.

The inspection entailed providing facility representatives with a brief explanation of the scope of the inspection, obtaining a verbal description of the facility's operating practices, conducting a visual inspection of the facility, and reviewing manifests of recent shipments of wastes as well as supporting records and analytical information. The inspection was conducted by (b) (6) and (b) (6) of A.T. Kearney. GMC Delco Moraine was represented by Marvin Hall, Environmental Engineer.

Mr. Dana J. Barnett  
October 12, 1990  
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### Facility Operations

GMC Delco Moraine, a manufacturer of automotive transmission parts for automobiles, is located in Fredericksburg, Virginia. The facility, currently operating under interim status, has applied for a permit to store waste onsite. The facility generates approximately 12 55-gallon drums of waste per week.

Currently, the facility operations include two salt baths which generate hazardous waste (D001) as a liquid which turns solid upon cooling. The manifests list the waste as (D001/D007) because of a one time shipment years ago. The facility continues to list (D007) waste, although they are no longer generating or storing it to satisfy state transport laws. The baths are desludged weekly. The waste is poured from the baths into 55-gallon drums at locations next to the baths. The drums are then placed approximately 30-feet away for temporary storage while the waste solidifies. Within 48 hours the drums are then placed outside at the hazardous waste drum storage area. A former storage area is currently undergoing closure. This unit, which was also inspected, was inactivated because of its close proximity to the facility property boundary. The facility contracts Envirosafe of Ohio, Oregon, Ohio to haul the drums out within 90-days to a permitted facility.

The generated wastes generally consist of a salt additive (Sodium Nitrite, Borax Pentahydrate), #15 Pellet Rectifier (Sodium Chloride, Potassium Chloride, and Ammonium Chloride), and 330 Quench Salts (Sodium Nitrite, Potassium Nitrate, Sodium Nitrate, and Proprietary Dye).

It was noted that there was a one time shipment of F001 waste in 1988 of laboratory wastes including acetone and chloroform. The facility no longer conducts any laboratory testing on-site, and therefore those wastes are no longer being generated.

### Potential Violations and Areas of Concern

During the course of the inspection, one violation was noted.

- o Facility personnel indicated that they do not enforce a no smoking policy where the D001 ignitable waste is being generated or stored. This is in violation of 40 CFR 265.17(a).

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In addition, three areas of concern were noted.

- o The inspection team did not observe any drums ready to be transported. Therefore, a determination could not be made whether they were being properly labelled for transport. The drums in storage, although marked as hazardous waste, were not clearly marked as to what specific wastes were contained inside the drums. Facility personnel indicated that all previous shipments have been labelled according to DOT regulations.
- o Facility personnel indicated that the baths are desludged weekly which produce 12 55-gallon drums of waste. This indicates that more than one drum may be temporarily stored in the satellite accumulation area being utilized for cool down. At the time of the inspection, only one drum was being stored in this area. However, if this is not the common practice it is a violation of 40 CFR 262.34(C)(1) which states that only one drum may be present at a time.
- o The facility representatives have properly identified the wastes as ignitable. However, the wastes consist of oxidizers which may also be reactive. It is suggested that the facility provide testing to determine if the wastes are reactive.

LDR/CEI checklists which were completed during the course of this inspection are provided in Attachment 1. Copies of a recent hazardous waste manifest for wastes shipped off-site from the facility are provided in Attachment 2. A photolog and logbooks are provided in Attachment 3. If you have any questions concerning this letter report, please contact me or (b) (6) at (703) 548-4700.

Sincerely,

(b) (6)  
(b) (6)  
Technical Director

Attachments

cc:

(b) (6)  
(b) (6)